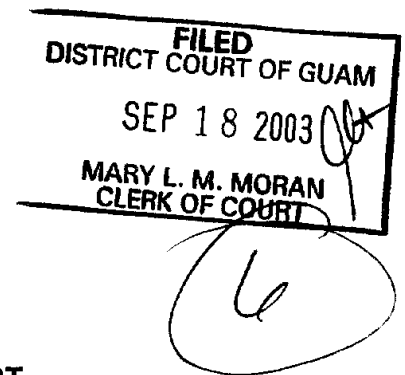


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IN THE UNITED STATES DISTRICT COURT

LA-RESA BLAS,

CIVIL CASE NO. 03-00027

Plaintiff,

vs.

PLAINTIFF'S OPPOSITION TO  
DEFENDANT BONG ROBATO'S  
MOTION TO STRIKE

IMPERIAL SUITES, INC.,  
d/b/a IMPERIAL SUITES HOTEL  
and BONG ROBATO,

Defendants.

\_\_\_\_\_ /

COMES NOW Plaintiff, by and through her attorneys and states as follows:

In 1991, the Civil Rights Act of 1964 was amended in 1991 to permit the recovery of compensatory damages for emotional pain, suffering, inconvenience mental anguish, loss of enjoyment of life, and other nonpecuniary losses. Pollard v. E.I. Dupont, 532 U.S. 843, 848 (2001). The amendment also permitted the recovery of punitive damages. Id. Further, the amendment provided that any party may demand a trial by jury. Landgraf v. USI Film Products, 511 U.S. 244, 247, (1994).

WHEREFORE, Plaintiff prays that this Honorable Court deny Defendant's Motion To Strike Plaintiff's demand for compensatory, punitive damages, and jury trial and requests any other relief this Court deems appropriate.

ORIGINAL

**CERTIFICATE OF SERVICE**

I certify that I will cause to be served upon F. Randall Cunliffe, Esq. of the Law Offices of Cunliffe & Cook, and to Thomas C. Sterling, Esq. of Klemm Blair Sterling & Johnson, PC, a true and correct copy of this document on or before September <sup>18</sup>~~17~~, 2003.

LAW OFFICES OF GORMAN & GAVRAS

Date: September 17, 2003

By. 

WILLIAM L. GAVRAS, ESQ.  
Attorneys for Plaintiff  
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